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DAMON R. TALLEY

ATTORNEY AT LAW

April 10, 2006

Ms. Beth O'Donnell  
Executive Director  
Public Service Commission  
PO Box 615  
Frankfort, KY 40602

RECEIVED

APR 13 2006

PUBLIC SERVICE  
COMMISSION

RE: PSC Case No. 2006-00065  
Oldham County Water District

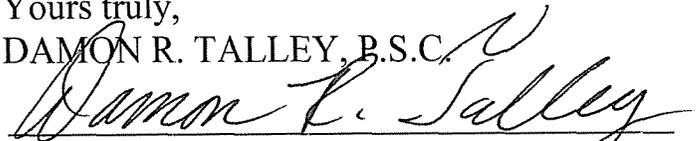
Dear Ms. O'Donnell;

Enclosed for filing are the original and ten (10) copies of the Oldham County Water District's Motion for an Extension of Time to file its Response to Commission Staff's Interrogatories and Request for Production of Documents.

The low bidder on the Tank Project, Caldwell Tanks, Inc., has extended its bid expiration date until May 10, 2006. This new bid expiration date should enable the Commission to grant the District's Motion for an Extension of Time and still afford the Commission adequate time to review and analyze the District's Response before the Tank Project bid expires.

Yours truly,

DAMON R. TALLEY, P.S.C.



DAMON R. TALLEY, CO-COUNSEL  
FOR OLDHAM COUNTY WATER  
DISTRICT

DRT:ms

Enclosures

cc: Hon. John R. Fendley, Oldham Co. Attorney  
Oldham County Water District

6/OCWD/O'Donnell 4-10-06

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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APR 13 2006

APPLICATION OF OLDHAM COUNTY WATER )  
WATER DISTRICT FOR A CERTIFICATE OF )  
PUBLIC CONVENIENCE AND NECESSITY TO )  
CONSTRUCT AN ELEVATED WATER TANK )

PUBLIC SERVICE  
COMMISSION

CASE NO. 2006-00065

**MOTION FOR EXTENSION OF TIME**

The Applicant, OLDHAM COUNTY WATER DISTRICT (the "District"), by Counsel, moves the Commission for a ten (10) day extension of time, through and including April 20, 2006, in which to file its Response to the Commission Staff's Interrogatories and Request for Production of Documents ("Information Request"). For cause, the District states as follows:

1. The District has been unable to compile all the information requested by the Commission Staff's Information Request within the original time allotted and needs approximately ten (10) additional days to compile all the information and fully respond to the Information Request.

2. The District is in the process of switching consulting engineering firms. For the past several years, the District has used the firm of SIECO, Inc. of Columbus, Indiana as its consulting engineers (SIECO, Inc. was acquired by Strand Associates, Inc. a few years ago). In 2004, the District engaged the services of GRW Engineers, Inc. to serve as its consulting engineers on future projects. Because Strand Associates, Inc. had already performed much of the design work for the Highway 146 Tank Project (the "Tank Project"), the District elected to have Strand Associates, Inc. finish the Tank Project.

3. Consequently, some of the information and documents requested by Commission Staff will be provided by Strand Associates, Inc. and some will be provided by GRW Engineers, Inc. Coordinating the production of documents from two (2) different engineering firms and the uncertainty of the areas of responsibility of each firm have caused a delay in fully responding to the Commission Staff's Information Request.

4. In addition, the District just recently engaged the services of the undersigned attorney to represent it in this matter. Since his employment, Mr. Talley has been diligently working to assist the District, but the District realizes that it will need additional time to prepare its Response to Commission Staff's Information Request.

5. The low bidder on the Tank Project, Caldwell Tanks, Inc., has extended its bid expiration date until **May 10, 2006**. Hopefully, this new bid expiration date will enable the Commission to grant the District ten (10) additional days in which to file its Response to Commission Staff's Information Request and still afford the Commission adequate time to review and analyze the District's Response before the Tank Project bid expires on **May 10, 2006**.

6. The District has already compiled some of the information and documents necessary to respond to some of the items contained in the Information Request. Rather than responding to the Information Request in a piecemeal fashion, however, the District prefers to submit its entire response in a single document.

7. Since there are no intervenors to this proceeding, granting the District the requested extension of time will not prejudice the rights of any other party.

For the foregoing reasons, the District respectfully requests a ten (10) day extension of time, through and including April 20, 2006, in which to file its Response to Commission Staff's Information Request.

This 10<sup>th</sup> day of April, 2006.

Respectfully submitted,

**DAMON R. TALLEY, P.S.C.**

  
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